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11 *Attorneys for Google LLC*

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 GOOGLE LLC,

16 Plaintiff,

17 vs.

18 SONOS, INC.,

19 Defendant.

Case No. 3:20-cv-06754-WHA

Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF ITS REPLY IN SUPPORT  
OF ITS MOTION TO STRIKE  
PORTIONS OF THE EXPERT REPORTS  
OF DOUGLAS SCHMIDT**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing  
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under  
7 Seal Portions of its Reply in Support of its Motion to Strike Portions of the Expert Reports of Douglas  
8 Schmidt (“Reply”). If called as a witness, I could and would testify competently to the information  
9 contained herein.

10 3. Google seeks an order sealing the materials as listed below:

11 Document	Portions to Be Filed Under Seal	Designating Party
12 Google’s Reply	Portions highlighted in yellow and green; portions outlined in red boxes	Google
13 Exhibit 1 to the Declaration of Nima Hefazi in Support of Google’s Reply (“Exhibit 1”)	Portions outlined in red boxes	Google
14 Exhibit 2 to the Declaration of Nima Hefazi in Support of Google’s Reply (“Exhibit 2”)	Portions outlined in red boxes	Google
15 Exhibit 3 to the Declaration of Nima Hefazi in Support of Google’s Reply (“Exhibit 3”)	Portions outlined in red boxes	Google

16 4. The portions of Google’s Reply highlighted in yellow and green and outlined in red  
17 boxes, as well as the portions of Exhibits 1, 2, and 3 outlined in red boxes, contain references to  
18 Google’s confidential business information and trade secrets, including source code for, and details  
19 regarding architecture and technical operation of, Google’s products and functionalities that Sonos  
20 accuses of infringement and/or that Google believes is prior art. The specifics of how these  
21 functionalities operate is confidential information that Google does not share publicly. Thus, public  
22 disclosure of such information could lead to competitive harm to Google as competitors could use  
23 these details regarding the architecture and functionality of Google’s products to gain a competitive  
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1 advantage in the marketplace with respect to their competing products. I also understand that a less  
2 restrictive alternative than sealing these documents would not be sufficient because the information  
3 sought to be sealed is Google's confidential business information and trade secrets but is necessary to  
4 Google's Reply.

5 I declare under penalty of perjury under the laws of the United States of America that to the  
6 best of my knowledge the foregoing is true and correct. Executed on February 17, 2023, in Los  
7 Angeles, California.

8 DATED: February 17, 2023

9 By: /s/ Nima Hefazi  
10 Nima Hefazi  
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**ATTESTATION**

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: February 17, 2023

/s/ Charles K. Verhoeven

Charles K. Verhoeven